

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

## Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**Re: Docket No.** \_\_\_\_\_

**SECOND ORDER (I) ENLARGING THE PERIOD  
WITHIN WHICH THE PLAN ADMINISTRATOR AND GUC  
TRUST MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF**

Upon the Motion (the “Motion”)<sup>2</sup> of the Plan Administrator and GUC Trust appointed in these chapter 11 cases requesting entry of an order (the “Order”) (a) enlarging the Removal Period for filing notices of removal of the Actions by 180 days, up to and including February 9, 2026, without prejudice to the Plan Administrator’s and GUC Trust’s right to seek further extensions; and (b) granting related relief; all as set forth more fully in the Motion; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings given to such terms in the Motion.

proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establishes just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The time period within which the Plan Administrator and GUC Trust may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is enlarged by 180 days, with a deadline for filing notices of removal on or before February 9, 2026.
3. This Order is without prejudice to the Plan Administrator's and GUC Trust's right to request a further extension of time to file notices of removal of any or all of the Actions.
4. Notice of the Motion as provided herein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.
5. The Plan Administrator and the GUC Trust are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.